



Great Lakes Carbon  
Corporation

5/30/85  
P.O. Box 667  
Niagara Falls, New York 14302  
716 283-5000

Mr. Charles Dolan  
Chief Site Investigation & Compliance Branch  
U.S. Environmental Protection Agency  
Region 11  
26 Federal Plaza  
New York, NY 10278

Dear Mr. Dolan:

Re: Request for Information under 42 U.S.C. § 9604(e)(1) and 42 U.S.C. § 6927(a);  
Hazardous Wastes -- Great Lakes Carbon EPA# NYD002118248

The following information is being provided in response to Mr. William J. Librizzi's letter of May 15, 1985, and the Information Request sheet which is attached.

Question  
Number

Response

1. PCB capacitors are currently in use in the plant electrical system, and over the years, some have been disposed of when their electrical integrity became degraded.
2. The capacitors consist of sealed metal containers filled with PCB liquid for insulating purposes. As of this writing, capacitors containing a total of 23,745.3 Kg. of PCB liquid are in service or stored as spares for future use. There are no capacitors in storage for disposal. The above figures are based on a recent plant inventory.
3. Not applicable; the capacitors are sealed metal containers.
4. Based on the records that currently exist, the following documents (copies of which are attached to this letter) cover the disposal of the capacitors referred to under Item 1:

Purchase Order NA 89892  
Hazardous Waste Manifest NY8136-1  
Hazardous Waste Manifest NY1704951  
Hazardous Waste Manifest NY2335383

323713



Question  
NumberResponse

5. Persons having knowledge of the facts relating to the disposal of the aforementioned capacitors are:
- Mike Reelee  
Randy Kaczynski  
5700 Niagara Falls Blvd.  
Niagara Falls, NY 14304
6. To the best of our knowledge, no other person (e.g., company, individual, partnership) used or transported or disposed of hazardous substances or wastes at our facility.
7. Yes, there are underground storage tanks located at our facility.
8. The information requested on the underground storage tanks:

<u>Tank</u>	<u>Approx. Year of Installation</u>	<u>Location</u>	<u>Volume</u>	<u>Status</u>
F01	1977	NW sector of plant	20,000 gallons	Fuel oil stored for emergency use
F02	1977	SW sector of plant	20,000 gallons	Fuel oil stored for emergency use
F03	1977	SE sector of plant	20,000 gallons	Fuel oil stored for emergency use
F04	1977	SE sector of plant	10,000 gallons	Fuel oil stored for emergency use

9. Per engineering specifications, the tanks in Question 7 are constructed of 5/16" hot rolled carbon steel and are coated on all outside surfaces with black asphaltum.
10. No repair work has been performed or is being contemplated in the near future for the tanks listed under Question 8.
11. Number 2 fuel oil has been and is currently stored inside the subject tanks.

Also attached is the notarized signature sheet certifying the information provided above.

Very truly yours,



George C. McBane  
Plant Manager

bms  
Attachments

STATE OF NEW YORK )  
 )  
 ) ss.:  
COUNTY OF Niagara )

Jane R. Barber  
Notary Public State of New York  
Qualified in Niagara County  
My Commission Expires 3/30/87.

GRAPHITE **GLC** PRODUCTS

DIVISION

Great Lakes Carbon Corporation

PURCHASE ORDER

P. O. Box 667

STREET ADDRESS OR P. O. BOX NO.

Niagara Falls, NY 14302

CITY, STATE AND ZIP CODE NO.

No. NA-89892

DATE 12/13/79

REG. NO. 494-5347 M. Reele	INQUIRY NO.	CONTRACT NO.	DELIVERY DATE asap	TERMS N/30	F.O.B. POINT SP
MAIL INVOICES IN TRIPLICATE TO: same					USE - SHOW ALSO APPROP. OR ACCOUNT NO. 370-16

SELLER

SHIP TO US AT

SCA Chemical Waste Disposal  
Balmer Rd.  
Lewiston, NY 14092

GREAT LAKES CARBON CORPORATION  
FINE & 58TH STREET MAIN PLANT  
NIAGARA FALLS, N.Y. 14302

VIAL. W.

ITEM	QUANTITY	DESCRIPTION	UNIT	PRICE	AMOUNT
1		Properly handle, transport & dispose of one (1) large high voltage capacitor in accordance with TSCA and all other appropriate rules and regulations.  Total cost (minimum charge)	lot	\$	\$300.00
<p>4 1/2 x 12 1/2 x 13 1/2</p> <p><i>Craig Avery</i> <i>Mike Mills</i></p> <p>12/28/79</p>					

PLEASE FURNISH THE MATERIAL DESCRIBED ABOVE.

Great Lakes Carbon Corporation PURCHASER

BY ACCEPTING OR FILLING THIS ORDER, OR ANY PART THEREOF, YOU AS SELLER HEREBY AGREE TO THE TERMS AND CONDITIONS ON THE FACE AND REVERSE SIDE HEREOF.

BY

G. G. Misener, Plant Purchasing Agent

P.O. NUMBER MUST APPEAR ON ALL INVOICES, PACKAGES, PACKING SLIPS, SHIPPING PAPERS AND CORRESPONDENCE.

2 PURCHASING DEPT. ALPHABETICAL FILE



# Uniform State HAZARDOUS WASTE MANIFEST

Waste Manifest No. **8136-1**

## PART A:

NAME	SITE ADDRESS	PHONE NO.	EPA I.D. NO.
GENERATOR <b>GREAT LAKES CARBON</b>	<b>5700 NIAGARA FALLS BLVD. NIAGARA FALLS, N.Y. 14304</b>	<b>(716) 278-8500</b>	<b>NOT REQUIRED</b>
TRANSPORTER NO. 1 <b>CECOS INTERNATIONAL, INC.</b>	<b>WALMORE RD. &amp; N.F. BLVD. NIAGARA FALLS, N.Y. 14302</b>	<b>(716) 721-3281</b>	<b>NY D 080336241</b>
TRANSPORTER NO. 2 (IF ANY)			
TREATMENT STORAGE OR DISPOSAL FACILITY <b>CECOS INTERNATIONAL, INC.</b>	<b>56TH ST. &amp; NIA. FALLS BLVD. NIAGARA FALLS, N.Y. 14304</b>	<b>(716) 282-2676</b>	<b>NY D 080336241</b>

IF MORE THAN TWO TRANSPORTERS ARE TO BE UTILIZED, FILL OUT THE FOLLOWING AS APPROPRIATE  
THIS FORM IS NO. \_\_\_\_\_ OUT OF A TOTAL OF \_\_\_\_\_. THE FIRST MANIFEST DOCUMENT NO IS \_\_\_\_\_

PROPER U.S. DOT SHIPPING NAME	U.S. DOT HAZARD CLASS	UN NUMBER	FORM				QUANTITY	UNITS				CONTAINERS NO. TYPE	EPA HAZ. CODE	EPA WASTE TYPE	
			SOLID	LIQUID	GAS	SLUDGE		GALLONS	CU. YDS.	POUNDS	TONS				
1 <b>PCB CAPACITORS</b>	<b>ORM-E</b>	<b>UN 2315</b>	<b>X</b>				<b>4000</b>			<b>X</b>		<b>8</b>	<b>17-H</b>	<b>N/A</b>	<b>NONE</b>
2															
3															
4															

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES INCLUDED IN SHIPMENT OF A NON-HAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)

**PRODUCT CODE - 1784-A**  
**WORK ORDER NO. 80478**

**NON-REGULATED UNDER RCRA**

**PCB weight 108.6 Kg**  
**Total weight 1818 kg**

**RECALCULATED AS 441 Kg. PX 9-14-82**

GENERATOR'S CERTIFICATION. This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, U.S. EPA, and the State. The wastes described above were consigned to the Transporter named. The Treatment, Storage or Disposal Facility can and will accept the shipment of hazardous waste and has a valid permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.

GENERATOR'S SIGNATURE <b>Randy A. Kaczynski</b>	TITLE <b>Senior Process Engineer</b>	DATE TO BE SHIPPED <b>2/13/81</b>	EXPECTED ARRIVAL DATE <b>2 13 81</b> Month Day Year
TRANSPORTER NO. 1 VEHICLE I.D. NO. <b>NY 9A090</b>	STATE <b>NY</b>	TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT <b>Philip W. Koeres</b>	DATE RECEIVED <b>2 13 81</b> Month Day Year

## PART B:

TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF DELIVERY AND NON-TAMPERING WITH SHIPMENT <b>Philip W. Koeres</b>	DATE DELIVERED <b>2 13 81</b> Month Day Year
TRANSPORTER NO. 2 VEHICLE I.D. NO. <b>NY 9A090</b>	STATE <b>NY</b>
STATE NUMBER TRANSPORTER NO. 2 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT	DATE RECEIVED Month Day Year
TRANSPORTER NO. 2 SIGNATURE AND CERTIFICATION OF DELIVERY AND NON-TAMPERING WITH SHIPMENT	DATE DELIVERED Month Day Year
TREATMENT STORAGE OR DISPOSAL FACILITY OF ANY DIFFERENCES BETWEEN MANIFEST AND SHIPMENT OR LISTING OF REASONS FOR AND DISPOSITION OF REJECTED MATERIALS	HANDLING METHOD 1 <b>D80</b> 2 3 4
TREATMENT STORAGE OR DISPOSAL FACILITY SIGNATURE AND CERTIFICATION <b>J. Eagan</b>	TITLE <b>Scalehouse</b>
DATE RECEIVED <b>2 13 81</b> Month Day Year	

WHITE - CECOS

CANARY - Invoice

PINK - Hauler's

GOLDENROD - Generator's

48-14-1 (1/780)

See cover sheet  
for instructionsSTATE OF NEW YORK  
DEPARTMENT OF ENVIRONMENTAL CONSERVATION

## HAZARDOUS WASTE MANIFEST

PLEASE TYPE

Part A:

DOCUMENT NO. NY **170495 1**

GENERATOR NAME <b>GREAT LAKES CARBON CORP.</b>	PHONE <b>716-283-5000</b>	EPA ID NO. <b>NYD002118848</b>
SITE ADDRESS <b>5700 NIAGARA FALLS BLVD., NIAGARA FALLS NY 14304</b>		
TRANSPORTER NO. 1 <b>SCA CHEMICAL SERVICES INC</b>	PHONE <b>716-754-8231</b>	<b>NYD049836679</b>
SITE ADDRESS <b>1550 BALMER ROAD, MODEL CITY, NY 14107</b>		
TRANSPORTER NO. 2	PHONE	
SITE ADDRESS		
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY <b>PCB INC.</b>	PHONE <b>816-221-3660</b>	<b>MO0980633044</b>
SITE ADDRESS <b>2100 WYNDOTTE AVE., KANSAS CITY, MO 64108</b>		

THIS FORM IS NO. OF A TOTAL OF THE FIRST MANIFEST DOCUMENT NO. IS NY

PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN/NA NUMBER	FORM	NET QUANTITY	UNITS	CONTAINERS NO.	TYPE	EPA HAZ CODE	EPA WASTE TYPE
POLYCHLORINATEDBIPHENYLS	ORM-E	UN 2315	02	1151703		4	01	T	B007

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES INCLUDED IN SHIPMENT OF A NONHAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)

**ONE DRUM CONTAINS RAGS AND RUBBER GLOVES WITH CAPICATORS**

GENERATOR'S CERTIFICATION. This is to certify that the herein named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA. The wastes described herein were consigned to the transporter named. The TSD Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. This shipment also conforms with all applicable State regulations. I certify that the foregoing is true and correct to the best of my knowledge.

GENERATOR'S SIGNATURE

Please type name also

*M. Reele*

DATE SHIPPED

12/2/83  
Mo. Day Yr.

EXPECTED ARRIVAL DATE

12/9/83  
Mo. Day Yr.

TRANSPORTER NO. 1 SIGNATURE "To the best of my knowledge the contents of the shipment I have accepted for transport conforms with the description on this manifest."

TRANSPORTER NO. 1  
PERMIT NUMBER

91PBY

DATE RECEIVED

12/2/83  
Mo. Day Yr.

COPY 3 Generator—Retained by Generator

Tape at this Department

To Be Typed by Generator

48-14-1 (4/81)

See cover sheet  
for instructionsSTATE OF NEW YORK  
DEPARTMENT OF ENVIRONMENTAL CONSERVATION

## HAZARDOUS WASTE MANIFEST

PLEASE TYPE

DOCUMENT NO. NY 233538 3

Part A:

GENERATOR NAME <b>Great Lakes Carbon Corp.</b>	PHONE <b>(716) 283-5000</b>	EPA ID NO. <b>NY D 002 118 248</b>
SITE ADDRESS <b>5700 Niagara Falls Boulevard, Niagara Falls, NY 14304</b>		
TRANSPORTER NO. 1 <b>Tonawanda Tank Transport Service</b>	PHONE <b>(716) 873-9703</b>	<b>NY D 09 764 4801</b>
SITE ADDRESS <b>1140 Military Road, Buffalo, NY 14217</b>		
TRANSPORTER NO. 2	PHONE	
SITE ADDRESS		
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY <b>SCA Chemical Services</b>	PHONE <b>(716) 754-8231</b>	<b>NY D 049836679</b>
SITE ADDRESS <b>1550 Balmer Road, Model City, NY 14107</b>		

THIS FORM IS NO. OF A TOTAL OF THE FIRST MANIFEST DOCUMENT NO. IS NY

PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN/NA NUMBER	FORM	NET QUANTITY	UNITS	CONTAINERS		EPA HAZ CODE	EPA WASTE TYPE
						NO.	TYPE		
1 Polychlorinated biphenyls	ORM-E	UN 2315	02	358	03	001	01	T	B007
Polychlorinated biphenyls	ORM-E	UN 2315	02	423	03	001	01	T	B007
3									
4									
5									
6									

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES INCLUDED IN SHIPMENT OF A NONHAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)

**Drums also contain gloves, suits, rope, metal pail, bag, and wrench.**

GENERATOR'S CERTIFICATION. This is to certify that the herein named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA. The wastes described herein were consigned to the transporter named. The TSD Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. This shipment also conforms with all applicable State regulations. I certify that the foregoing is true and correct.

GENERATOR'S SIGNATURE

Please type name also

**M. Reece***M. Reece*

DATE SHIPPED

08 11 84  
Mo. Day Yr.

EXPECTED ARRIVAL DATE

08 11 84  
Mo. Day Yr.

TRANSPORTER NO. 1 SIGNATURE "To the best of my knowledge the contents of the shipment I have accepted for transport conforms with the description on this manifest."

TRANSPORTER NO. 1  
PERMIT NUMBER**NY 9A080**

DATE RECEIVED

08 11 84  
Mo. Day Yr.



Great Lakes Carbon  
Corporation

P.O. Box 667  
Niagara Falls, New York 14302  
716 283-5000

April 9, 1985

Mr. Henry G. Williams  
Commissioner  
N.Y.S.D.E.C.  
50 Wolf Road  
Albany, NY 12233-0001

Dear Commissioner Williams:

Re: Hazardous Waste Disposal Sites  
Charles N. Goddard's letter of April 3, 1985

Please be advised that the site in question was used to landfill plant wastes such as graphite and carbon shapes, brick, concrete, solid pitch, etc., from the time manufacturing operations began in 1939 up to and including 1966. Samples of typical materials known to be landfilled were tested in accordance with RCRA criteria and were determined to be nonhazardous.

Our records indicate that this site was never classified as containing hazardous materials and, therefore, we must question the basis for classifying this former landfill as a hazardous waste disposal site.

This information was previously transmitted to Charles N. Goddard in a letter dated October 15, 1984, but a response has yet to be received.

Sincerely yours,

Mike Reelee, P. E.  
Senior Engineer

bms

cc: A. F. Souka - GLC Elizabethton  
G. C. McBane - GLC Niagara Falls  
J. D. McKenzie - GLC New York